

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAIMARIA BODOR,	:	CIVIL ACTION
Individually and on behalf of all	:	
others similarly situated,	:	
	:	
Plaintiffs	:	
v.	:	NO. 19-cv-5787(JMG)
	:	
MAXIMUS FEDERAL SERVICES, INC.,	:	
	:	
Defendant	:	

**DEFENDANT MAXIMUS FEDERAL SERVICES, INC.’S
CONSENT MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Federal Rule of Civil Procedure 5.2(d), and Local Rule of Civil Practice and Procedure of the United States District Court for the Eastern District of Pennsylvania 5.1.5, Defendants Maximus Federal Services, Inc. (“Maximus” of “Defendants”), respectfully moves for leave to file their Opening Brief in Support of Motion for Summary Judgment, the Statement of Undisputed Facts, and the Joint Appendix under seal. In support of their unopposed motion, Defendant states as follows:

1. Plaintiff commenced this action on December 9, 2019 alleging improper “collection activity” by Defendant resulting in the withholding of Plaintiff’s tax refund.
2. Defendant’s Opening Brief in Support of Motion for Summary Judgment and Statement of Undisputed Facts will contain sensitive, non-public and proprietary business and financial information of Maximus Federal Services, Inc.
3. The Joint Appendix contains sensitive, non-public and proprietary business and financial information of Maximus Federal Services, Inc. and Plaintiff. Pursuant to this Court’s Confidentiality Agreement, the Parties have labeled the documents contained in the Joint Appendix as “Confidential.”

4. Although there generally is a presumption in favor of public accessibility, the Court has authority to seal documents when justice so requires, provided the party requesting sealing carries its burden of good cause.

5. Defendant respectfully submits that good cause exists here.

6. Defendant will comply with all applicable local rules and procedures regarding filing under seal through the Court's CM/ECF system.

WHEREFORE, Defendant Maximus Federal Services, Inc. respectfully requests that this Honorable Court grant its Motion and enter the attached Order permitting Defendant Maximus Federal Services, Inc. to file the Opening Brief in Support of Motion for Summary Judgment, the Statement of Undisputed Facts, and the Joint Appendix under seal.

Respectfully Submitted,

/s/ Marisa Rachel DeFeo

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Dated: January 28, 2021